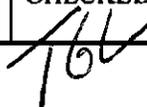


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	PROCESSED BY LLD	CHECKED BY 

OWNER/OPERATOR:

COID: 800057

KINDERMORGAN LIQUID TERMINALS, LLC
1100 TOWN AND COUNTRY RD
ORANGE, CA 92868

CONTACT PERSON: YIJIN WANG
MANAGER, EHS
(714) 560-4886
yijin_wang@kindermorgan.com

EQUIPMENT LOCATION:

2000 E. SEPULVEDA BLVD.
CARSON, CA 90810

CONTACT PERSON: MIKE TILTON
AREA MANAGER
(310) 518-7700
michael_tilton@kindermorgan.com

EQUIPMENT DESCRIPTION

A/N 528299
TV DeMinimus Significant Revision

528298 (prev A/N 342312: R-F16481)	Rack 2C	Replace pump no. 40 with two new pumps (40a and 40b), one as backup
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FACILITY BACKGROUND:

Kinder Morgan Liquids Terminals (KMLT), a subsidiary of Kinder Morgan Energy Partners, operates an existing petroleum product storage tank farm, gasoline bulk loading racks, and a pipeline transfer center at its Carson Terminal, located at the southeast corner of Alameda Street and Sepulveda Boulevard in the City of Carson. This is a major petroleum products terminal which consists of about 70 storage tanks, five gasoline loading racks, two vapor recovery and disposal systems, and other ancillary equipment. The total storage capacity is

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about 4.26 million barrels and the gasoline loading racks handle an average of 1.9 million gallons per day.

The tanks are connected by a pipeline system that allows products to move about the facility as well as with nearby refineries. In addition, large capacity shipping pumps connect the facility to the intrastate and interstate pipeline system from which petroleum products can be transfer to Southern California, Nevada, and Arizona.

The Carson Terminal is a Title V facility with an Initial Title V Application, A/N 338924, effective 5/17/10, and the facility is currently covered by Facility Permit ID 800057.

INTRODUCTION:

A/N 528298 was submitted October 13, 2011 to replace Pump No. 40 with two pumps (40a and 40b), with one as backup in Rack 2-C. Pumps 40a and 40b is "common to" all 5 existing racks. All the racks are vented to an existing VRS (thermal oxidizers) for VOC control. There is no change in thruput.

PROJECT DESCRIPTION:

There will be an increase in fugitive emissions from the installation of these pumps with their associated connections. See Excel Spreadsheet for emissions.

EMISSIONS CALCULATIONS:

See spreadsheet for fugitive calculations.

Emissions from the new components are ROG = 0.49 lb/day.

EVALUATION

Rules:

Rule 462

This is a Class A facility and the rack will comply with the emission limit of 0.08 lb/1000 gal when vented to afterburners (A/N 469051:P/O G11318 and A/N 523131:P/O G14632) since conditions limit (on Emissions and Requirements portion) emissions to VOC = 0.0565

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lb/1000 gal. The racks were CARB certified at 14 mmgpd (if vented to the primary thermal oxidizer) and 4.8 mmgpd (if vented to the backup thermal oxidizer).

Compliance with R462 is expected.

Reg 13

Fugitive emissions from the new components are limited to 350 ppm. At this level, emissions from the new fugitive components are less than one pound per day, so BACT is not required. Emissions are less than 0.5 lb/day so offsets are not required.

Rule 1401

There is no increase in risk from these racks associated with this modification. Compliance expected.

40 CFR 60 Subpart XX

The loading rack is subject to XX and is vented to two afterburners which will meet an emission limit of 35 mg/L (0.29 lb/1000 gal). Compliance expected.

40 CFR 63 Subpart EEEE

The loading rack is subject to applicable requirements of this rule. Compliance expected.

40 CFR 63 Subpart R

The loading rack is subject to Subpart R and will comply with the emission limit of 10 mg/L (0.08 lb/1000 gal).

Title V:

This is a diminimus significant revision to the TV Permits. A 45 day EPA notice is required.

CONCLUSION:

Issue a Permit to Construct with attached conditions after completion of the 45-day EPA review period.

Fugitive Component Count

Process Unit: KinderMorganCarson

Source Unit	Service	No. Of Existing Components (1)	No. of Existing Components to be Removed (2)	No. of New Components to be Installed (3)	Correlation Equation Factor, New Construction (500 ppm)			Correlation Equation Factor, New Construction (350 ppm)		
					Correlation Equation Factor 500 ppm Screening Value	Current Emissions Based on Correlation 500 ppm Screening Value (lbs/year)	Post Modifications Emissions based on 500 ppm Correlation Equation Factor (lbs/year)	Correlation Equation Factor 350 ppm Screening Value (lbs/year)	Emissions based on 350 pm Correlation Equation Factor (lbs/year)	
Valves	Sealed Bellows	All	0	0	0.00	-	0	-	-	
	SCAGMD Approved I&M Program	Gas / Vapor	0	0	0	4.55	-	-	3.48	-
		Light Liquid (4)	0	0	10	4.55	-	45.46	3.48	34.83
		Heavy Liquid (5) > 8 inches				4.55	-	-	3.48	-
Pumps	Sealless Type		0		46.83	0			-	
	Double mechanical Seals or Equivalent Seals	Light Liquid (4)	0	1	2	46.83	-	46.83	37.51	37.51
	Single Mechanical Seals	Heavy Liquid (5)		0		46.83	0		37.51	-
Compressors	Gas / Vapor	0	0		9.09	-	-	7.23	-	
Flanges (ANSI 16.4-1998)	All	0	0	0	6.99	-	-	5.43	-	
Connectors	All	0		28	2.86	-	80.12	2.20	61.62	
Pressure Relief Valves	All	0	0	2		-	-		-	
Process Drains with P-trap or Seal Pot	All	0	0	0	9.09	-	-	7.23	-	
Other (including knobs, hatches, sight glasses, and meters)	All	0	0	6	9.09	-	54.54	7.23	43.38	
Total Emissions	lbs/year					-	226.94		177.33	
	lbs/day					-	0.63		0.49	
Emission Increase	lbs/year						226.94		177.33	
	lbs/day								0.49	

- 1 Any component currently installed prior to the modification.
- 2 Any component to be removed due to modification.
- 3 Any new component proposed to be installed due to the modification; this also includes new components to
- 4 Light liquid and gas/liquid streams: Liquid or gas/liquid stream with a vapor pressure greater than that of kerosene (>0.1 psia @ 100°F or 689 Pa @ 38°C), based on the most volatile class present at 20% by volume. - used single mechanical seal EF
- 5 Heavy Liquid: streams with a vapor pressure equal to or less than that of kerosene (< 0.1 psia @ 100°F or 689 Pa @ 38°C), based on the most volatile class present at 20% by volume.